## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA, Plaintiff,

v.

[1] JULIO JOSE RODRIGUEZ-CUMBA, Defendant.

CASE NO. 21-359 (PAD)

# THE UNITED STATES' MOTION FOR AN EXTENSION OF TIME TO SUBMIT TRANSLATIONS OF EXHIBITS

#### TO THE HONORABLE COURT:

COMES NOW, the United States of America through the undersigned attorney and very respectfully states and prays as follows:

- 1. On March 25, 2022, the United States filed a response to the Defendant's Motion to Suppress. (ECF No. 88).
- 2. In said motion, the United States makes reference to three exhibits which contain the Spanish language and had been provided to translators at the United States Attorney's Office.
- 3. The United States in error failed to provide a fourth exhibit also in the Spanish language to the translators at the United States Attorney's Office.
- 4. The United States apologizes to the Court, and respectfully requests leave of the Court to file the translations of the four exhibits within five days.

WHEREFORE, the United States respectfully requests this Honorable Court grant the instant request and allow the United States to file the translations of exhibits by Friday, April 8, 2022.

## RESPECTFULLY SUBMITTED.

San Juan, Puerto Rico, this 4th day of April 2022.

W. STEPHEN MULDROW UNITED STATES ATTORNEY

W. STEPHEN MULDROW United States Attorney

/s/ Ryan R. McCabe
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#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to counsel for the defendant.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 4h day of April 2022.

W. STEPHEN MULDROW UNITED STATES ATTORNEY

W. STEPHEN MULDROW United States Attorney

/s/ Ryan R. McCabe Ryan R. McCabe – G03505 Assistant United States Attorney Torre Chardon, Suite 1201 350 Carlos Chardon Street San Juan, PR 00918 ryan.mccabe@usdoj.gov